UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Gawker Media LLC, et al.1

Debtors.

Chapter 11

Case No. 16-11700 (SMB)

(Jointly Administered)

SUPPLEMENTAL DECLARATION IN FURTHER SUPPORT OF THE RETENTION AND EMPLOYMENT OF DELOITTE FINANCIAL ADVISORY SERVICES LLP AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS PURSUANT TO SECTIONS 328(a), 330 AND 1103(a) OF THE BANKRUPTCY CODE EFFECTIVE NUNC PRO TUNC TO JUNE 28, 2016

Pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), John Doyle, under penalty of perjury, declares as follows:

- 1. I am a managing director of the firm of Deloitte Financial Advisory Services LLP ("Deloitte FAS"). I am duly authorized to make and submit this declaration (the "Declaration") on behalf of Deloitte FAS in accordance with section 327(a) of title 11 of the United States Code and Bankruptcy Rule 2014(a) in further support of the retention and employment of Deloitte FAS as financial advisor to the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned chapter 11 cases, as authorized by orders of the Court [D.I. 348, 433].
- 2. The statements set forth in this Declaration are based upon my personal knowledge, upon information and belief, and upon client matter records kept in the ordinary

The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.'s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.'s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

course of business that were reviewed by me or other personnel of Deloitte FAS or its affiliates.

- 3. As discussed in paragraph 9 of my declaration (the "Original Declaration") submitted in support of the Committee's application to retain and employ Deloitte FAS [D.I. 218], I stated that Deloitte FAS would supplement the Original Declaration as appropriate. The disclosures set forth below are subject to the statements and qualifications made in the Original Declaration, which are incorporated herein by reference.
- 4. Accordingly, by this Declaration, I am providing the following supplemental information in connection with Deloitte FAS's retention and services as financial advisor to the Committee.
- 5. I have become aware that on December 13, 2016, XP Vehicles, a party that had asserted a now-expunged claim against the Debtors, filed a notice in the cases alleging that a conflict of interest exists with respect to Deloitte FAS's role as financial advisor to the Committee [D.I. 613] (the "Notice"). The Notice seems to allege that, prior to the Petition Date, "Deloitte" provided advisory services for XP Vehicles and certain of the Debtors.
- 6. In response to such allegations, Deloitte FAS reviewed the search it undertook in connection with its retention to determine and disclose whether it or its affiliates have any relationships with the potential parties in interest provided to Deloitte FAS by the Committee or the Debtors. As an initial matter, XP Vehicles was not included on the potential parties in interest list provided to Deloitte FAS. Further, based upon additional conflict database searches conducted by Deloitte FAS, as of the date of this Declaration, Deloitte FAS has not identified any engagements by it or its affiliates for either XP Vehicles or the Debtors.

7. For the aforementioned reasons and as set forth in the Original Declaration, I believe, that Deloitte FAS does not hold or represent an interest adverse to the Debtors' estates, and remains a "disinterested person" as defined in the Bankruptcy Code.

Dated: December 21, 2016

DELOITTE FINANCIAL ADVISORY SERVICES LLP

By: /s/ John Doyle
Partner
Deloitte Financial Advisory Services LLP

Financial Advisor to the Official Committee of Unsecured Creditors of Gawker Media LLC, et al.